CS

JONES DAY

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July 7, 2017

By Certified Mail – Return Receipt Requested

Mr. James Franzoni
Owner, Pintail Point Shooting Clay School
511 Pintail Point Farm Lane
Queenstown, MD 21658

Mr. Michael Schaefer
Owner, Pintail Point Shooting Clay School
511 Pintail Point Farm Lane
Queenstown, MD 21658

The Point at Pintail, LLC
RA: Dierdra Schaefer
511 Pintail Point Farm Lane
Queenstown, MD 21658

New Pintail Point, LLC
RA: Jonathon Wall
200 Westgate Circle, Suite 500
Annapolis, MD 21401

River Plantation, LLC
RA: James Franzoni
10075 Red Run Boulevard, Suite 550
Owings Mills, MD 21117

Re: NOTICE OF VIOLATION AND INTENTION TO SUE PURSUANT TO 42 U.S.C. § 6972 AND 33 U.S.C. § 1365

Dear Recipients:

The Midshore Riverkeeper Conservancy, Inc., (hereinafter, "Riverkeepers") gives notice that, on or after the 90th day from the date of this notice, in accordance with 42 U.S.C. § 6972(b)(2)(A), Riverkeepers intends to initiate a citizen suit against James Franzoni and Michael

Schaefer (hereinafter, "Owners/ Operators"), as owners and operators of The Point at Pintail, LLC, New Pintail Point, LLC, River Plantation, LLC, and Pintail Point Sporting Clay School (hereinafter, "Pintail Point") pursuant to Section 7002(a)(1)(B) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6972(a)(1)(B). The suit will allege that Owners/ Operators' past and continuing disposal of lead shot at Pintail Point presents an imminent and substantial endangerment to health and the environment.

Further, this letter shall serve as notice that, on or after the 60th day from the date of this notice, pursuant to Section 505(a)(1)(A) of the Clean Water Act ("CWA"), 33 U.S.C. § 1365(a)(1)(A), Riverkeepers intends to file a citizen suit against Owners/ Operators pursuant to Section 301 of the CWA, 33 U.S.C. § 1311(a). The suit will allege that Owners/ Operators' past and continuing practices at Pintail Point, since at least March 19, 2012, has resulted in unlawful discharges of pollutants from a point source into waters of the United States, without the authorization of a National Pollutant Discharge Elimination System ("NPDES") permit.

I. FACTUAL BACKGROUND

1. Background on Pintail Point

Pintail Point is a recreational sporting clay course open year-round and located along the Wye River on Maryland's Eastern Shore in Queenstown, Maryland. The property comprises 300 acres and four miles of shoreline. Pintail Point has been in operation since 1995 and currently has 25 shooting stations. For many years, the shooting range has used lead shot at their shooting stations. This lead shot is abandoned and left to leach into the surrounding environment.

2. Summary of Events between Owners/ Operators and Riverkeepers

In the Spring of 2015, Jeff Horstman, the Riverkeepers' Executive Director and Miles-Wye Riverkeeper, approached Mr. Franzoni about testing for lead at Pintail Point. On July 17, 2015, Mr. Horstman took samples of soil and water from the site, with Mr. Franzoni's permission. The sample results came back dangerously high, prompting Mr. Horstman to ask that Mr. Franzoni stop shooting over or near water and that no agricultural activity occur on the property until more testing could be done. However, Mr. Franzoni refused to allow Riverkeepers to conduct additional testing.

In August 2015, Mr. Horstman met with Mr. Franzoni to discuss the implications of the test results. During this meeting, Mr. Franzoni agreed that the lead needed to be cleaned up. He indicated that he had made inquires to a few companies and was evaluating proposals. A few weeks later, on August 27, 2015, Mr. Horstman, with Mr. Franzoni's knowledge, sent letters to the Maryland Department of the Environment and the Queen Anne's County Health Department, notifying each of the test results.

On Sept. 2, 2015, Mr. Horstman met again with Mr. Franzoni in person to further discuss the high test results. Mr. Franzoni reiterated his promise to remediate the lead. It was noted at that time that crops were still being grown on the property where shooting was occurring and adjacent to shot fall zones.

On Dec. 1, 2015, Mr. Horstman and Mr. Franzoni met with Mark Mank from the Maryland Department of the Environment and Mr. Franzoni was provided with EPA's Best Management Practices ("BMPs") for Lead at Outdoor Shooting Ranges. Mr. Franzoni again promised to take remedial actions at that time. Specifically, Franzoni agreed to contact a lead abatement company to arrange for lead abatement, and to stop planting crops near the range.

In a series of conversations in person and by phone during 2016, Mr. Franzoni pledged to Mr. Horstman that he would cease shooting lead after December 31, 2016, and would then take action to remediate the lead. In October 2016, Mr. Franzoni told Riverkeepers that his lease on all of his range shooting equipment would expire on April 30, 2017, and that he would not be renewing the lease and would cease the public shooting range activities on that date. He also informed Mr. Horstman that he had been in contact with a lead remediation firm, had sent them Riverkeepers' testing data, and intended to engage them to remediate the lead per BMPs by the end of summer 2017. Near the end of 2016, Mr. Franzoni hired a lead abatement firm, MT2, to conduct a site visit and a study to determine the leachable lead at the site. MT2 visited the site in December and issued their report in February 2017, a report which confirmed that there were dangerously elevated levels of lead at Pintail Point.

Most recently, Mr. Horstman met with Mr. Franzoni on June 7, 2017. At that meeting, Mr. Franzoni conceded that the lead shot shooting has not stopped due to complications between he and his partner Mr. Schaefer, and that no lead remediation has been done.

3. Findings of Lead Contamination at Pintail Point

With the Owners/ Operators' permission, Riverkeepers staff took samples of soil and water in the area on July 17, 2015. *See* Attachment 1 – Map Sites for Testing. Riverkeepers staff noted that the area was covered in years of lead shot and clay debris accumulation. Test results revealed very high levels of lead in the field where shooting occurs, in the wetland grass just beyond the range, and even in the soybean field behind the range.

Lead occurs naturally in the soil at levels between 15-40 mg/kg.[1] Riverkeepers' control samples (Site 7), taken near the Pintail Point Welcome Center but away from shooting stations,

[1] Soil Lead Contamination can be analyzed in milligrams of lead per kilogram of soil. The lab that performed the test – UMass Amherst Soil Testing Lab – breaks up the results into four ranges of lead contamination levels. A mg/kg value of less than 22 is considered to have "low" levels of lead. A range of 22-126 is considered "medium," while 127 to 293 is deemed "high."Soil that contains lead levels of greater than 293 mg/kg is deemed to

showed extracted lead levels in this range, between 11-20 mg/kg. While the control samples were normal, samples taken in and around the shooting range showed abnormal and dangerous toxic amounts of lead: (*See* Attachment 2 – Test Results for Lead Analysis for full results).

Soil – (See Map for locations)	**Location**	**Lab ID #**	**Depth**	**mg/kg**
Field	Site # 1	188903	1-2"	237
		188904	2-6"	476
		188905	6-9"	483
Grass - wetland	Site #2	188906	1-2"	325
		188907	2-6"	377
		188908	6-9"	264
Grass-wetland	Site # 3	188908	1-2"	518
		188910	2-6"	288
		188911	6-9"	390
Field	Site # 4	188912	1-2'	756
		188913	2-6"	753
		188914	6-9"	384
Grass - Soy bean	Site # 5	188915	1-2"	922
		188916	2-6"	2090
		188917	6-9"	441
Field	Site # 6	188918	1-2"	270
		188919	2-6"	98
		188920	6-9"	152
Control	Site # 7	188921	1-2"	11
		188922	2-6"	20
		188921	6-9"	15

Soil with lead at these concentrations is extremely dangerous. At estimated total lead levels equivalent to extracted levels of over 22 mg/kg, pregnant women and young children are advised to avoid contact with soil.[2] Equivalent extracted levels above 293 mg/kg are "considered

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have "very high" levels of lead contamination and the lab advises that soil in this range be brought to the attention of the local Health Department, Cooperative Extension, or the Department of Environmental Protection. *See* https://soiltest.umass.edu/fact-sheets/soil-lead-testing-interpretation-recommendations.

[2] *Id.*

a concern for all users and may represent a hazardous waste situation."[3] Five of the six soil test sites included multiple readings in this "very high" category; the other sites readings were "high" or "medium", but still well above the level where young children and pregnant women are advised to avoid contact.

In early 2017, Mr. Franzoni contracted with MT2, a firing range and remedial services company, to perform its own site visit and conduct a study to determine the leachable lead from lead contaminated samples as measured by the US EPA Toxicity Characteristic Leaching Procedure ("TCLP"). 40 C.F.R. § 261.24 provides that a solid waste is toxic, and therefore hazardous if, using appropriate testing methods, an "extract from a representative sample of the waste contains any of the contaminants listed… at the concentration equal to or greater than" that specified. 40 C.F.R. § 261.24(a). For lead, the TCLP concentration threshold is 5.0 mg/L. Two of the samples that MT2 tested were above this threshold and are thus toxic. *See* Site Visit Report and Treatability Study to the Point at Pintail at 7, prepared by MT2, February 1, 2017. Upon information and belief, Owners/Operators have not taken any efforts to implement MT2's recommendations.

II. OWNER'S OPERATION OF PINTAIL POINT PRESENTS AN IMMINENT AND SUBSTANTIAL ENDANGERMENT TO HEALTH AND THE ENVIRONMENT.

The purpose of RCRA is to reduce the generation of and ensure proper treatment, storage, and disposal of solid and hazardous waste "so as to minimize the present and future threat to human health and the environment." 42 U.S.C. § 6902(b). Under RCRA, any person can bring a civil suit against a "past or present owner or operator of a treatment, storage, or disposal facility, who has contributed or who is contributing to the past or present handling, storage, treatment, transportation, or disposal" of (1) "any solid or hazardous waste" which (2) "may present an imminent and substantial endangerment to health or the environment." 42 U.S.C. § 6972(a)(1)(B).

In this case, Owners/ Operators' improper disposal of lead shot at Pintail Point has contaminated and continues to contaminate the land in the area with unsafe levels of lead, has polluted and continues to pollute ground water, and has endangered and continues to substantially endanger surface water quality. These actions cause or contribute to an imminent and substantial endangerment to health and the environment.

1. Pintail Point is Disposing of Solid Waste in the Form of Lead Shot.

The types of waste covered under the Citizen Suit provisions are not confined to

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[3] *Id.*

"hazardous waste"; rather, it includes "solid waste", which is very broadly defined. 42 U.S.C. § 6803(5) defines "hazardous waste" to include solid hazardous waste which may cause or significantly contribute to an increase in mortality or serious irreversible or incapacitating reversible illness or pose a substantial present or potential hazard to human health or the environment. 42 U.S.C. § 6803(27) defines "solid waste" to include "discarded material, including solid, liquid, semisolid, or contaminated gaseous material resulting from industrial, commercial, mining and agricultural operations, and from community activities".

If lead is not regularly removed, and if no steps are taken to minimize its release or migration, or it is abandoned in berms, it is solid waste and thus subject to regulation under the RCRA. *See* EPA Best Management Practices for Lead at Outdoor Shooting Ranges at I-7. To date, there has been no clean up of existing lead shot at Pintail Point, meanwhile the amount of pollution has increased rapidly after the facility doubled the number of rounds and added more shooting sites.

In a case with very similar facts, *Connecticut Coastal Fishermen's Association v. Remington Arms Co.*, 989 F.2d 1305 (2d Cir. 1993), the operator of a skeet and trap shooting club had conducted testing and even submitted a remediation plan by the time the United States Court of Appeals for the Second Circuit heard the case. However, no lead shot or clay target fragments had been removed from Lordship Point or the surrounding waters of Long Island Sound. The Second Circuit affirmed the district court's ruling that the club operator's conduct over a 70-year period, in which over 2,400 tons of hazardous lead shot were deposited into an area inhabited by ducks, mussels, and other wildlife, contributed to the creation of an imminent and substantial environmental endangerment. *Id.* at 1309. In reaching this conclusion, the Court held that "as a matter of law, lead shot is a solid waste which, due to its toxicity and the fact that it poses substantial threat to the environment, is a hazardous solid waste subject to RCRA remediation and regulation." *Id.* at 1315-18.

2. The Disposed Lead Shot Presents an Imminent and Substantial Endangerment to Both Health and the Environment.

2.a. The Risks Posed By Discarded Lead Shot Are Substantial.

Over time, discarded lead shot will leech into surrounding soil and water which poses a serious risk of harm to nearby living organisms. Absorbed or ingested lead can cause a range of biochemical, physiological, and behavioral effects in species of invertebrates, fish, amphibians, reptiles, birds, and mammals. Wildlife can be exposed to lead through feeding in aquatic environments and ingesting contaminated vegetation and sediments, feeding on invertebrates or vertebrates containing lead, or ingesting lead pellets or fragments directly, mistaking them for food, grit, or bone. *See* Petition To The Environmental Protection Agency To Regulate Lead Bullets And Shot Under The Toxic Substances Control Act at 19, Center for Biological Diversity

et al., March 13, 2012 (hereinafter, "CBD Petition").

Ingesting lead has harmful effects on neurological functions, bone structure, renal function, reproductive functions, pancreatic functions, and muscular functions, among others.[4] Lead is toxic to organisms at very low levels, and has lethal and severe sub-lethal effects at higher levels. Lead can act as a neurotoxin, and numerous studies indicate that blood lead concentrations even below 10 micrograms per deciliter can have adverse developmental effects on intellectual functioning and social-behavioral conduct in humans. Human fetuses and young children are particularly sensitive to even low levels of lead exposure and can easily suffer permanent neurological damage. Lead accumulates in humans mainly in bones, with lead in blood and other tissues reflecting more recent exposure. CBD Petition at 48-49.

In large enough doses, lead can cause brain damage leading to seizures, coma, and death. Chronic overexposure to low levels of lead can cause health impairments to develop over time, and irreversible damage can occur without obvious symptoms. Lead exposure can adversely affect the nervous system (resulting in impaired cognition, reduced motor coordination, and palsy), renal system, and cardiovascular system. Lead is also implicated in decreased growth, decreased brain volume, spontaneous abortion, kidney damage, cancer, and cardiovascular disease. Lead is especially dangerous to fetuses and young children and poisoning is even more pronounced because the lead is absorbed faster and disrupts development, causing slow growth, development defects, and damage to the brain and nervous system. Some studies link elevated bone or blood lead levels with aggression, delinquent behavior, attention deficit hyperactivity disorder and criminal behavior. The consensus among medical researchers is that there is no safe level of lead exposure in young children. *Id.*

2.b. Lead Contamination at Pintail Point Poses Imminent Risk to Human Health

The levels of lead in the soil at Pintail Point present an immediate and ongoing risk to human health. Four of the six sites tested above the Maryland Department of Environment "residential" cleanup standard for soil (400 mg/kg) and thus require remediation. This standard applies to land used for recreational purposes and land uses "where there is potential for more extensive soil ingestion"; it "could also include agricultural land use associated with the propagation of vegetation."[5] Five of the six sites represent a "concern for all users and may

[4] The effects of lead poisoning can include: damage to the brain and central nervous system; kidney disease; high blood pressure; anemia; and damage to the reproductive system, including decreased sex drive, abnormal menstrual periods, impotence, premature ejaculation, sterility, reduction in number of sperm cells, damage to sperm cells resulting in birth defects, miscarriage, and stillbirth, painful gastrointestinal irritation, diarrhea, loss of appetite, weakness and dehydration, nerve disorders, memory and concentration problems, muscle and joint pain. CBD Petition at 48-49.

[5] http://www.phaseonline.com/assets/Site_18/files/MDE%20June%202008%20VCP%20Cleanup%20Standards.pdf at 6.

represent a hazardous waste situation."[6] The final site's levels are still well above the level where young children and pregnant women are advised to avoid contact.

The pond next to the range tested above Maryland's legal limits for chronic lead toxicity. Maryland law sets this limit at 2.5 micrograms/L for fresh water, but "Water Sites" two and three tested at 18 micrograms/L and 8.5 micrograms/L, respectively. *See* Attachment 2; MD. CODE REGS. 26.08.02.03. Due to the nature of how lead contaminants travel through bodies of water, humans could directly consume this lead when they eat fish from the Wye River or swim in its waters, as individuals living along the Wye River near Pintail Point tend to do.

Additionally, the very dry, dusty nature of the area during warmer seasons creates a health hazard from airborne lead particles. Lead particles in the air are every bit as toxic to humans and are able to travel over greater distances. Patrons access the range in golf carts on dirt roads, kicking up lead-contaminated dust that patrons and neighbors then breathe.

Yet despite this, patrons of all ages — likely unaware of the risks to their health — continue to use the facility. In years past, Pintail Point has run a children's summer camp on this lead-contaminated property, and may continue to do so. Year-round, Pintail Point offers shooting lessons to children, and even offers a discount to those under the age of 16. Children are highly susceptible to lead poisoning because their brains and nervous systems are still developing, and damage from lead is irreversible.

Finally, the very high lead levels in the soybean field evinces a particularly serious risk. Soybean crops have been planted within shooting distance or closely adjacent to the shooting stations. The area is relatively flat, with no meaningful barrier between the shooting range and the field; thus, lead shot can easily fall on the crops and contaminate the soil. Soy plants uptake lead; whether these crops are used for animal feed or human products, there is an uncomfortably high likelihood that the lead in these crops will eventually be consumed by humans.

2.c. Discarded Lead Shot at Pintail Point Poses Imminent Risk to the Environment

To date, there has been no clean up or remediation efforts undertaken at Pintail Point. Decades' worth of abandoned lead shot litters the area, which poses an immediate and ongoing threat to the environment.

Lead from the discarded shots is slowly leeching into the local ecosystem, wreaking havoc on wildlife. Lead can be readily absorbed by aquatic organisms and birds through water and sediment. For reptiles and amphibians near heavily hunted wetlands and shooting ranges,

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[6] https://soiltest.umass.edu/fact-sheets/soil-lead-testing-interpretation-recommendations.

consumption of waterborne lead and ingestion of lead-contaminated sediments and food items are likely exposure pathways. *See* CBD Petition at 23.

Furthermore, irrespective of the leeching, discarded lead shots constitute a present threat to many animal species, as animals often eat them because they are mistaken for grit or food (seeds). CBD Petition at 20. Research has shown that over 75 terrestrial species of birds are known to be poisoned by spent lead ammunition. There is extensive documentation of direct ingestion of lead shot and bullet fragments by dabbling and diving ducks, swans, loons and other water birds, as well as birds feeding in wetland areas such as flamingoes, rails, shorebirds, terns and herons. Secondary poisoning of birds consuming wounded or dead prey contaminated with lead ammunition and scavenging of gut piles with spent lead ammunition or fragments is a significant source of toxic exposure to predatory and scavenging birds. *See* CBD Petition at 23.

III. PINTAIL POINT DISCHARGES POLLUTANTS INTO THE WYE RIVER IN VIOLATION OF THE CLEAN WATER ACT

The CWA's purpose is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters," eliminating the discharge of pollutants into navigable waters to make them fishable and swimmable. 33 U.S.C. § 1251(a). It aims to protect the health of the American people and the environment from contamination like that at Pintail Point. To achieve this, Section 301 of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of any pollutant from a point source into waters of the United States unless such discharge is in compliance with an NPDES permit.

Pintail Point is in violation of the CWA because without a permit it continues to (i) discharge a pollutant (ii) from a point source (iii) into navigable waters. *See* 33 U.S.C. §§ 1311, 1342, 1344, and 1362.

Courts have already determined that for the purpose of a CWA suit, lead shot is a pollutant and a shooting range may be a point source. *See Long Island Soundkeeper Fund v. N.Y. Athletic Club*, WL 131863 (S.D.N.Y. 1996) (finding lead shot and clay target debris are pollutants under CWA, that CWA does not require a showing that pollutants harm the environment, and that the shooting range is a point source); *see also C.T. Coastal Fisherman's Ass'n v. Remington Arms Co*, 989 F.2d 1305 (2d Cir. 1993) (finding that both lead and steel shot are "pollutants").

The Wye River is navigable water where people fish, swim, and recreate. Although patrons of Pintail Point are less likely to shoot directly over the river, several stations are close enough to it that lead shot and debris still directly enter the water. For each lead shot that falls directly into the river, Pintail Point is blatantly committing an ongoing violation of the CWA. However, CWA liability is not limited to discharges of pollutants *directly* into navigable waters.

See e.g., *Rapanos v. United States*, 547 U.S. 715, 743 (2006) (plurality opinion) ("a point source need not be the original source of the pollutant; it need only convey the pollutant to 'navigable waters.'"). When it rains, streams run from the grey area beyond "Site 6" down to "Water 1," carrying lead-contaminated sediment into the Wye River. *See* Attachment 1. This also constitutes a violation of the CWA. *See N.C. Shellfish Growers Ass'n v. Holly Ridge Assocs.*, LLC, 278 F. Supp. 2d 654, 680 (E.D.N.C. 2003) (finding that where pollution was reaching a navigable water through naturally developed gullies and ditches, these conveyances are point sources, and the fact that the defendant did not actually construct the conveyance did not relieve it of liability under the CWA).

IV. RELIEF SOUGHT BY RIVERKEEPERS

Riverkeepers requests that before the expiration of the notice period, Owners/ Operators agree to an enforceable and binding remediation plan and bring Pintail Point into total compliance with the EPA's Best Management Practices for Lead at Outdoor Shooting Ranges. Specifically, Riverkeepers seeks an agreement whereby Owners/ Operators and Pintail Point consent to the following:

Background: Site Assessment

- Hire an expert to continue testing to determine the extent of the contamination.
- Hire an expert to conduct a site-specific assessment of the facility (soil acidity, physical characteristics, annual rainfall, groundwater depth, vegetation, accessibility to reclamation equipment, etc.) to determine the most appropriate lead remediation strategies.

Step 1: Control and Contain

- Reduce the area of the shot fall zone. This will concentrate the shot for easier cleanup. *See* EPA BMPs at III-4.
- Install "bullet containment devices that match the range's specific shooting patterns and manufacturers' specifications," EPA BMPs at II-4, to catch all lead and clay debris so that they no longer leach into the soil. Consult with a variety of vendors to determine what system is best for Pintail Point.

Step 2: Prevent Migration

- Move stations farther away from water, wetlands, and farmland to flat locations.
- Monitor and adjust soil pH, immobilize lead, and control runoff in accordance with EPA BMPs best suited to Pintail Point.

Step 3: Remove and Recycle

- Hire removal contractors to apply standard BMPs to either separate lead from the soil or remove the contaminated soil. Time is of the essence, as lead in soil can break down and migrate, especially in soils that have had fertilizer applied.
- Regularly remove debris so that they do not enter the air and water.

Step 4: Document Activities

- Maintain written records of the number of rounds fired over time at the range, bullet/shot size, and all remediation activities.

Should no agreement be reached, Riverkeepers intends, at the close of the 90-day statutory waiting period, to file a citizen suit under Section 7002 of RCRA, 42 U.S.C. § 6972, against Owners/ Operators for their past and present contribution to the endangerment of health or the environment, and to seek thereby injunctive relief, statutory maximum civil penalties, costs, attorney and expert witness fees, and such additional relief as the court determines is appropriate. *See* 42 U.S.C. § 6972(e).

Furthermore, Riverkeepers intends, at the close of the 60-day notice period, to file a citizen suit under Section 505 of the CWA, 33 U.S.C. § 1365, against Owners/ Operators seeking statutory maximum civil penalties, as well as injunctive and remedial relief, costs, attorney and expert witness fees, and such additional relief as the court determines is appropriate. *See* 33 U.S.C. § 1365(d).

V. ENTITIES RESPONSIBLE FOR THE ALLEGED VIOLATIONS

Upon information and belief, the entities responsible for the violations alleged above are The Point at Pintail, LLC, New Pintail Point, LLC, River Plantation, LLC, and Pintail Point Sporting Clay School, collectively referred to throughout this Notice as "Pintail Point." Pintail Point is located at 511 Pintail Point Farm Lane, Queenstown, MD 21658. Its phone number is (410) 827-7029. Upon further information and belief, since 2012, Pintail Point has been owned and operated by James Franzoni and Michael Schaefer.

VI. ENTITY PROVIDING NOTICE

The entity providing this notice is Midshore Riverkeeper Conservancy, Inc., 24 N. Harrison St., Easton, MD 21601, referred to throughout this Notice as "Riverkeepers." Riverkeepers is a 501(c)(3) non-profit, public benefit corporation organized under the laws of the State of Maryland, dedicated to the restoration and protection of the Choptank, Miles, and Wye Rivers, the Eastern Bay, and all of their tributaries. Riverkeepers represents a supporting membership of over one thousand individuals and families, and a majority of the members live on or near these waterways, use them for recreational activities such as boating, swimming,

crabbing, fishing, bird watching and hunting, and derive aesthetic pleasure from their beauty. Riverkeepers serves as an advocate for the health of these waters and the living resources they support.

Riverkeepers may be contacted by mail, via email at info@midshoreriverkeeper.org, or by phone at (443) 385-0511; however, all communications related to this Notice should be directed to the undersigned legal counsel.

Sincerely,

Kevin Holewinski
Jones Day
51 Louisiana Avenue N.W.
Washington, DC 20001
Phone: (202) 879-3797
kpholewinski@JonesDay.com

Danielle Einik
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Sean Rigby
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Copies by certified mail, return receipt requested, to:

Jefferson Sessions, Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue N.W.
Washington, DC 20530

Stephen M. Schenning, Acting United States Attorney
District of Maryland
36 S. Charles Street, 4th Fl.
Baltimore, MD 21201

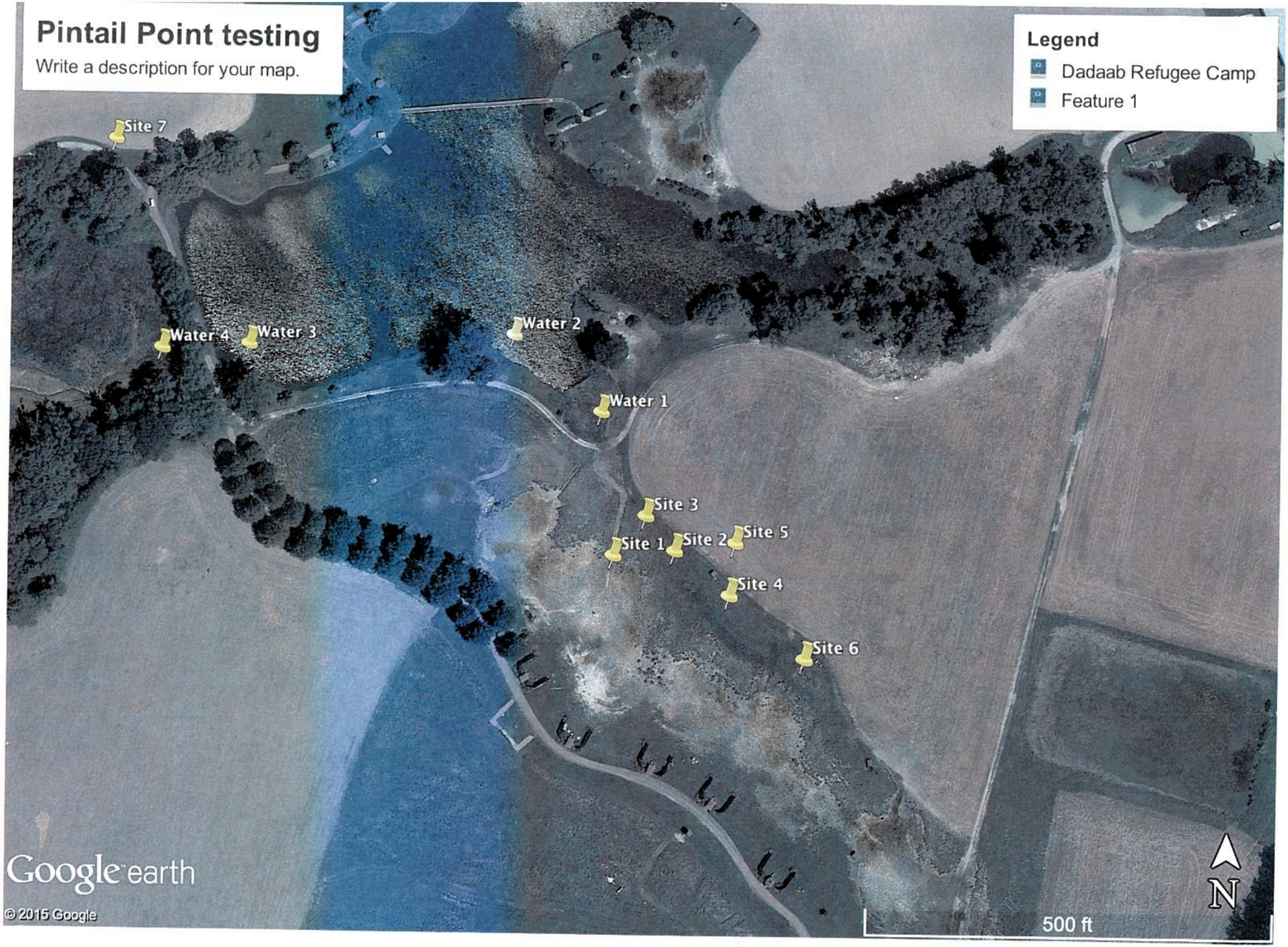
Scott Pruitt, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20004

Cecil A. Rodrigues, Acting Regional Administrator
U.S. Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, PA 19103

Ben Grumbles, Secretary
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230

ATTACHMENT 1

Map of Sites for Lead Testing


Pintail Point testing
Write a description for your map.
Legend
Dadaab Refugee Camp
Feature 1
Site 7
Water 4
Water 3
Water 2
Water 1
Site 3
Site 1
Site 2
Site 5
Site 4
Site 6
Google earth
© 2015 Google
500 ft
N

ATTACHMENT 2

Lead Analysis Test Results

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188903	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	1-2'	Site:	Site 1	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 8:00	HJG	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	237	7/31/15 13:21	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

Printed: Aug 4 2015 8:23AM

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312

ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID: 188904
Description: 2-6'
Type: Grab

Matrix: Soil/Sludge
Site: Site 1

Sample Start: 7/17/15 8:00
SampleEnd:
Date Received: 7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 8:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	476	7/31/15 13:21	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188905	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	6-9'	Site:	Site 1	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 8:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	483	7/31/15 13:21	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312

ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID: 188906
Description: 1-2'
Type: Grab

Matrix: Soil/Sludge
Site: Site 2

Sample Start: 7/17/15 8:00
SampleEnd:
Date Received: 7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 8:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	325	7/31/15 13:21	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188907	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	2-6'	Site:	Site 2	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 8:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	377	7/31/15 13:21	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312

ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID: 188908
Description: 6-9'
Type: Grab

Matrix: Soil/Sludge
Site: Site 2

Sample Start: 7/17/15 8:00
SampleEnd:
Date Received: 7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	264	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188909	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	1-2'	Site:	Grass Wet	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	518	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312

ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188910	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	2-6'	Site:	Grass Wet	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	288	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

ENVIROCORP LABS SINCE 1981

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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID: 188911
Description: 6-9'
Type: Grab

Matrix: Soil/Sludge
Site: Grass Wet

Sample Start: 7/17/15 8:00
SampleEnd:
Date Received: 7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	390	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

ENVIROCORP LABS SINCE 1981

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID: 188912
Description: 1-2'
Type: Grab

Matrix: Soil/Sludge
Site: Field - High

Sample Start: 7/17/15 8:00
SampleEnd:
Date Received: 7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	756	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188913	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	2-6'	Site:	Field - High	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	753	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

ENVIROCORP LABS
SINCE 1981
51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID: 188914
Description: 6-9'
Type: Grab

Matrix: Soil/Sludge
Site: Field - High

Sample Start: 7/17/15 8:00
SampleEnd:
Date Received: 7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	384	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

ENVIROCORP LABS SINCE 1981

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188915	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	1-2'	Site:	Grass Wet	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	922	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188916	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	2-6'	Site:	Grass Wet	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	2090	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188917	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	6-9'	Site:	Grass Wet	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	441	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

ENVIROCORP LABS SINCE 1981

51 Clark St. Harrington, DE 19952
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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188918	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	1-2'	Site:	Field - Low	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	270	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188919	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	2-6'	Site:	Field - Low	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	98	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

ENVIROCORP LABS SINCE 1981

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID: 188920
Description: 6-9'
Type: Grab

Matrix: Soil/Sludge
Site: Field - Low

Sample Start: 7/17/15 8:00
SampleEnd:
Date Received: 7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	152	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188921	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	1-2'	Site:	Control	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	11	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188922	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	2-6'	Site:	Control	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	20	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

ENVIROCORP LABS SINCE 1981

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188923	Matrix:	Soil/Sludge	Sample Start:	7/17/15 8:00
Description:	6-9'	Site:	Control	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Metals Digestion for AA		Completed	7/30/15 9:00	HJG3	EPA 200.2
Metals -Dry Weight					
Lead (Dry Weight)	mg/kg	15	8/4/15 11:25	HJG3	EPA 6020

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312

ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188924	Matrix:	Waste Water	Sample Start:	7/17/15 8:00
Description:		Site:	Field Ditch	SampleEnd:	
Type:	Grab			Dale Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Lead	mg/L	0.186	7/22/15 17:25	HJG3	EPA 200.9
Metals Digestion for AA		Completed	7/22/15 8:00	HJG3	EPA 200.2

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID: 188925
Description:
Type: Grab

Matrix: Waste Water
Site: Pond at ditch

Sample Start: 7/17/15 8:00
SampleEnd:
Date Received: 7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Lead	mg/L	0.018	7/22/15 17:25	HJG3	EPA 200.9
Metals Digestion for AA		Completed	7/22/15 8:00	HJG3	EPA 200.2

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312

ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID:	188926	Matrix:	Waste Water	Sample Start:	7/17/15 8:00
Description:		Site:	Pond at overflow	SampleEnd:	
Type:	Grab			Date Received:	7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Lead	mg/L	0.0085	7/22/15 17:25	HJG3	EPA 200.9
Metals Digestion for AA		Completed	7/22/15 8:00	HJG3	EPA 200.2
QA/QC					
Lead (% Recovery)	% Rec.	90.0	7/22/15 17:25	HJG3	EPA 200.9

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

ENVIROCORP LABS
SINCE 1981
51 Clark St. Harrington, DE 19952
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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Midshore Riverkeeper Conservancy
24 North Harrison St
Easton, MD 21601

Attention: Jeffery Horstman

Lab ID: 188927
Description:
Type: Grab

Matrix: Waste Water
Site: Main stream after dam

Sample Start: 7/17/15 8:00
SampleEnd:
Date Received: 7/17/15 10:10

Parameters	Units	Results	Analyzed	By	Method
Metals					
Lead	mg/L	<0.0040	7/22/15 17:25	HJG3	EPA 200.9
Metals Digestion for AA		Completed	7/22/15 8:00	HJG3	EPA 200.2

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

Midshore Riverkeeper Conservancy
Attention: Jeffrey Horstman (443)385-0511
24 North Harrison Street
Easton, MD 21601

ENVIROCORP, INC
Chain of Custody Record

Collection Information | **Preservation**

Lab ID #	Date	Time	Description	Yes	No	Analysis
1A 188903	7/17	8:00	Site 1 - 1-2' } Field		X	Lead
1B 188904			Site 1 - 2-6' } Field		X	Lead
188905			Site 1 6'-9' } Field		X	Lead
188906 2A			Site 2 - 1-2 } Grass/wet		X	Lead
188907 2B			Site 2 2-6 } Grass/wet		X	Lead
188908 2C			Site 2-6'-9' } Grass/wet		X	Lead
188909 3A			1-2 } Grass Wet		X	Lead
188910 3B			2-6 } Grass Wet		X	Lead
188911 3C			6-9 } Grass Wet		X	Lead
188912 4A	↓	↓	1-2 —		X	Lead

Relinquished By:	Date	Time	Received By:	Comments
Kenneth Stevens	7/17/15	1010	Kelly Sumner	

Midshore Riverkeeper Conservancy
Attention: Jeffrey Horstman (443)385-0511
24 North Harrison Street
Easton, MD 21601

ENVIROCORP, INC
Chain of Custody Record

Collection Information | **Preservation**

Lab ID #	Date	Time	Description	Yes	No	Analysis
188913 4B	7/17	8:00	2-6 } Field - High		X	Lead
188914 4C			6-9 }		X	Lead
188915 5A			1-2 } Cross Wash		X	Lead
188916 5B			2-6 }		X	Lead
188917 5C			6-9 }		X	Lead
188918 6A			1-2 } Field - low		X	Lead
188919 6B			2-6 }		X	Lead
188920 6C			6-9 }		X	Lead
188921 7A			1-2 } Control		X	Lead
188922 7B			2-6 }		X	Lead

Relinquished By:	Date	Time	Received By:	Comments
Kenneth Stevens	7/17/15	1010	Kelly Salmon	

Midshore Riverkeeper Conservancy
Attention: Jeffrey Horstman (443)385-0511
24 North Harrison Street
Easton, MD 21601

ENVIROCORP, INC
Chain of Custody Record

Collection Information | **Preservation**

Lab ID #	Date	Time	Description	Yes	No	Analysis
188923 C			C - 9 - Field Control		X	Lead
					X	Lead
Water					X	Lead
					X	Lead
188924 1-A	→		Field Ditch		X	Lead
188925 2-A	→		Pond at Ditch		X	Lead
188926 3-A	→		Pond at overflow		X	Lead
188927 4-A	→		W/E Main Stem after Dam		X	Lead
					X	Lead
					X	Lead

Relinquished By:	Date	Time	Received By:	Comments
Kenneth Kerney	7/17/15	1010	Kelly Salmon	